FILE COPY

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1947

Office-Supreme Court, U.S.
FILED
OCT 9 1947
CHARLES ELMORE CROPLEY
CLERK

No. 262

N. L. HUDSON, ET AL.,
Petitioners,

vs.

GULF REFINING CO., ET AL.,
Respondents

RESPONSE OF ALL RESPONDENTS TO PETITIONERS' REPLY

JOHN E. GREEN, JR.,
R. E. WILBOURN,
IRWIN W. COLEMAN,
W. H. WATKINS, SR.,
W. CALVIN WELLS,
~~JUDGE~~ J. M. STEVENS,
J. R. BUCHANAN,
STONE WELLS,
W. R. NEWMAN,
W. S. WELCH,
P. H. EAGER, JR.,
GARNER W. GREEN, SR.

WILBOURN & WILBOURN,
Meridian, Mississippi;
WATKINS & EAGER,
Jackson, Mississippi;
WELLS, WELLS, NEWMAN & THOMAS,
Jackson, Mississippi;
STEVENS & CANNADA,
Jackson, Mississippi;
BUCHANAN & MONTGOMERY,
Laurel, Mississippi;
WELCH, COOPER & WELCH,
Laurel, Mississippi;
GREEN & GREEN,
Jackson, Mississippi.

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1947

No. 262

N. L. HUDSON, ET AL.,

Petitioners,

vs.

GULF REFINING CO., ET AL.,

Respondents

RESPONSE OF ALL RESPONDENTS TO PETITIONERS' REPLY

I

All Respondents re-adopt that precedently said, submitting that it has not been satisfactorily answered and that certiorari should be denied, but certain unexpected angles have been integrated by Petitioners' reply whereto additional response is here made.

Response to Petitioners' Part I.

Hartford Accident and Indemnity Company v. *Bunn,* 285 U. S. 169, 76 L. Ed. 685, was decided March 14, 1932. Thereafter, Rule 48 was adopted and it may well be that this rule was effectual as to State judgments, compare *Wilson* v. *City of Lexington,* 153 Miss. 209, 119 So. 795, but there was no Congressional sanction as in the case of the Rules of Civil Procedure. This question as to the efficacy

thus to change that precedently existing in part by statute is the question, with deference, as yet undetermined.

II

Response to Petitioners' Part II, using the same numbering employed by Petitioners.

I

Opposite counsel erroneously say, where the cross-bill had been filed, p. 8:

> "The Supreme Court of Mississippi, however, did not sustain the chancellor's view, but assumed *that right to dismiss to exist.*"

Thereon, Mississippi's Supreme Court did not pass abstractly but, bearing in mind Petitioners' motion to dismiss the entire suit wherein these cross-bills had been filed, distinctly said: (Res. Br. 96, 97)

> "*Had there been no cross-bills, it may have been* that the complainants would have had the right to dismiss, as they sought to do, but leaving that question aside for the moment, we are of the opinion that they had no right to do so and at the same time secure the dismissals of the cross-bills, unless by the consent, express or implied, of the cross-complainants." (Italics ours, unless otherwise noted.)
>
> • • • • • • •
>
> "We are of the opinion, therefore, that the court was correct in not dismissing the cross-bills, and in proceeding to a final hearing on them, without the attendance of cross-defendants, who purposely absented themselves; * * *".

Petitioners never recognized that the Chancellor refused to dismiss the suit as an entirety and conceded that by reason thereof it was essential for Petitioners to assert their

right in Mississippi's Supreme Court, that after such refusal they take no step therein. *Mitchell* v. *Film Transit Co.*, 194 Miss. 550, 13 So. 2d 154. Petitioners specifically concede, original Br. p. 50:

> "* * * It was extremely urgent that Petitioners be given this opportunity to test finally their right to dismiss because of the rule of Mississippi practice providing that a litigant waives his right to dismiss without prejudice if he goes to trial on the merits—see *e.g.* Mitchell et al., *v.* Film Transit Co., et al., (1943) 194 Miss. 550, 13 So. (2) 154, from which the fifth syllabus is quoted:
>
> " 'Where guardian proceeded with trial after his motion to non-suit chancery case was overruled as if no motion had been made, he could not thereafter complain of order overruling motion.' "

Conceding, further, at page 58:

> "Under Mississippi procedure, when Petitioners declined to proceed further at the special term of chancery court the only thing the chancellor could do was to *dismiss their bill with prejudice:*
>
> " 'In order to carry out his purpose the guardian should have declined to proceed with the trial and thereupon the defendant *would have been entitled to a dismissal with prejudice,* which would have been a final judgment appealable by the guardian.'
>
> "Mitchell *v.* Film Transit Co., 194 Miss. 550, 13 So. (2d) 154."

While Petitioners concede the rule in Mississippi that they may not take any step if they would rely on their motion to dismiss without prejudice, an entirely different question is presented in this Court. Before this Court interferes under certiorari, it must know, from the facts, that the party seeking certiorari is entitled to rely under the facts on the Due Process Clause. Where, in order to raise a question of local practice in the State Supreme Court in accordance

with the State practice, Petitioners forewent presentation of the facts to the State court, they may not, by reason of such action, have relief in this Court, for this Court has no assurance that Petitioners have any case under the facts, especially in view of the county records, lawfully re-established, showing an absolute conveyance from N. L. Hudson to Mary E. Hudson in 1880. R. 895. Compare *Pennekamp* v. *Florida,* 328 U. S. 331, 90 L. Ed. 1295, and other cases cited.

Gulf Refining Company, hereinafter called "Gulf," most pointedly has not conceded in this record (nor do Petitioners so contend) that Petitioners had acquired the right to dismiss. Gulf has consistently contended that its cross-bill was not dismissed. This cross-bill precluded dismissal by Petitioners without prejudice without the consent of Gulf which was never given and there was no error in refusing Petitioners the right to dismiss the entire suit without prejudice. Such a dismissal would have, with deference, contravened all precedent Mississippi decisions and palpably violated Mississippi Statutes.

Petitioners vigorously complain of Gulf: (p. 9)

> "* * * Gulf's Brief goes so far as to set forth, on Page 77 of its appendix, some sort of abstract of a supposed conveyance although no record reference of the supposed conveyance is made * * *".

With deference, note Respondents' response, page 2:

> "* * * Thereto those respondents who purchased from Mary E. Hudson in fee and those claiming under such purchasers made full answer, denying title and setting up a conveyance in fee from N. L. Hudson to Mary E. Hudson in the year 1880 (Appendix "A", R. 895) * * *".

This deed is an official record lawfully established and presently existing in Jasper County, whose terms are

sought to be controverted by Petitioners who admit they have no copy of this deed, but therefor sought discovery from Respondents.

II

Petitioners say, Br. p. 10:

> "In attempting to respond to our argument concerning the tense atmosphere of the chancery court of Jasper County, Mississippi, Respondents have, as anticipated, *sought to predicate their answer on matters wholly outside the record.*"

With deference, this is respectfully denied, but if therein we offend, we are conscious that the Court will disregard, but we submit that Petitioners have definitely transgressed this rule.

1. There was no armed guard at any time present at the May Term of the Chancery Court of Jasper County, Res. Br. p. 17, *et seq.*

2. The only place wherein this letter from the Chancellor, under confidential cover, appears is (Record pages 724, 730, App. 63), when Petitioners assumed to file said alleged reasons at the May Term, whereon specifically they requested no order be entered and at which time, if an order were entered, confessedly it means, according to their concession, a termination of their point. So this letter thus then appearing could not be as a pleading and they could not introduce under it any evidence, and, as shown in our response, Br. 5, 17 *et seq.*, this letter could not be in any way a part of the record whereof either the Chancery Court, Mississippi's Supreme Court, or this Court could take any judicial notice whatever and, therefore, everything said by Petitioners as to this letter and its contents are extra the record.

3. As shown, the Chancellor could not, Mississippi's Supreme Court could not, therefore, this Court can not take any judicial action on that which is assumed to appear in the letter, because that letter is neither pleading nor proof, having never been lawfully introduced so as to become a part of the record and, therefore, all portions of Petitioners' brief having reference thereto, with deference, rely upon that which is extra the record.

4. The contention that the learned Chancellor called the May Term improperly is outside the record.

5. Please advert to the declaration of opposite counsel on page 29:

> "There is not the slightest inference anywhere that the apprehension of Petitioners arising from the threats extended to Gulf at all."

Surely therefor Gulf may not be penalized.

Petitioners say, Br. p. 11:

> "* * * which letter Petitioners made a part of the record before the chancellor".

Counsel contends that the Chancellor was misled by counsel for Respondents contending that the Chancery Court had exclusive jurisdiction and we repeat that the District Court could not possibly take jurisdiction under the decision made by the Court of Appeals in *Calcote* v. *Texas Pacific Coal & Oil Co.*, 157 Fed. 2d 216, 328 U. S. (No. 1) 29, 91 L. Ed. 80; Rehearing denied 328 U. S. (No. 1) 30, 91 L. Ed. 242. The names of the parties are shown in original cause No. 398 and when compared with those named in the suits introduced as to the complainants, the discrepancy is apparent and the diversity completely would disappear. Judge Stevens' contention, p. 13, was absolutely appropriate, but why the Chancellor ruled as he did, no one from

this record may tell further than that he refused to dismiss and thereafter, when petitioners withdrew, rendered judgment.

The contention of Gulf (p. 14):

> " 'That sought was not so in rem as to make the jurisdiction of either the State Court or the Federal Court exclusive of the other, but that these two suits could so operate, one in one court, the other in the other court, as that both in due course could be brought to final judgment. . . .' "

is substantially the same as it has been throughout. The District Court, on diverse citizenship, can never take possession of this controversy because the citizenship is not diverse. In the hearing in the District Court on September 29th, counsel for Petitioners conceded, substantially, insofar as confirmation was sought and cancellation was sought, there was lack of jurisdiction as to the realty, contending for possible jurisdiction as to discovery and personal judgment.

III

Contention is made as to invalidity by reason of the minority and military service of Claudies Newell and Paul Ellis Newell. Wars will cease and minors will attain majority and for these Petitioners to raise this question, they must show that military service and minority existed May 6, 1946. Appendix, 79. Compare *Alsworth* v. *Cordtz*, 31 Miss. 32, 36, wherein it is said:

> "It is however said, that he was then a minor, and could not bind himself any more by his silence than he could by his contract—grant it. We must presume that he had arrived at majority before judgment was recorded against him, * * *."

As counsel for these parties, the Newells, presently at the bar of this Court, we affirm in accordance with this pre-

sumption that their military service terminated before January 1, 1946, and that their minority terminated before May 6, 1946, their natal days being, Claudies Newell, March 9, 1925, and Paul Ellis Newell, July 9, 1923. Furthermore, the position of Petitioners, with deference, is so fundamentally fallacious on this score as to be ludicrous. Herein, the Hudsons—majors—sued the Newells—then minors. In this cause, at the hearing (assuming them still to be minors), the Newells appeared by their attorney and licked the Hudsons soundly and legally. That now contended is that the majors, who thus had the summons issued and the service had, having been worsted by the minors in lawful, judicial combat, may declare that combat illegal and irregular by reason of the minority of their adversary. Not so. Compare *Southern Automobile Co.* v. *Holifield,* 145 Miss. 511, 111 So. 96, 43 C. J. S., "Infants," Sec. 43, 27 Am. Jur., "Infants," Sec. 34, p. 772. Frankly, the minors alone have a right to complain and adults are bound just as though they were dealing with adults. *Harvey* v. *Briggs,* 68 Miss. 60, 8 So. 274. The disability is vouchsafed for the minor's protection and if it were potentially possible for the major thus contracting and thus judicially worsted to set up the minor's disability for the protection of the major thus worsted, it would certainly pervert and destroy the rule. Frankly, such contention is contrary to all settled adjudication.

Opposite counsel say, Br. p. 16:

> "• • • Neither denies that the rule in Mississippi is, as quoted on Page 57 of our Brief from the Mississippi cases there cited and as announced within the last year or two:
>
> " '. . . the Court will not proceed to a final decree as to any defendant until the cause is triable as to all the defendants . . .
>
> " 'Where there are several defendants, the cause is not ready for trial as to one, until ready as to all of the defendants.' "

But at the May Term, the Newells were out of the Army and both of lawful age, the court heard their counsel lawfully appearing and demanding trial. The plaintiffs could not thereof in any wise complain. Compare 31 *C. J.*, p. 1157:

> "• • • But the late infant coming of age is entitled to personally manage his own defense."

27 Am. Jur., "Infants," Sec. 117, p. 838:

> "If the infant comes of age during the pendency of the action, and continues to prosecute it, any right on his part to avoid the judgment is lost."

Surely, if these former infants had lost the right personally, their adversary claiming derivatively could not assert that which had ceased to exist.

Paepcke Leicht, etc., Co. v. *Savage,* 137 Miss. 11, 101 So. 709, in no way contravenes. Therein was sought to be set up as an adjudication a void proceeding wherein no service whatsoever, as by law required, had been had. Confessedly, that decree was a nullity.

Naught contained in *Dorsey* v. *Sullivan,* — Miss. —, 24 So. (2d) 852, contravenes ought herein contended for. Whether, by reason of the Newell minors having become adult, the court should proceed, was a question for the Chancery Court's determination and these persons as adults having therein appeared no irregularity may now be assigned. Compare *Parker* v. *Smith,* 150 Miss. 849, 117 So. 249.

Herein, the infants are claiming under this judgment and thus claiming as adults have foregone any right to disaffirm.

The case of *Dorsey* v. *Sullivan, supra,* was directly called by Petitioners to the attention of Mississippi's Supreme Court and presumptively duly considered by it.

Naught contra is found in *Parker* v. *Smith, et al.,* 150 Miss. 849, 117 So. 249, wherein the infant was sued and im-

proper return made in the justice court in which court judgment, however, was rendered for the defendant, infant. Thereupon, the plaintiff, Parker, appealed to the Circuit Court wherein the trial was *de novo* and the minor moved to dismiss on the ground that the summons had not been legally served. The court so held and this was affirmed, but in the opinion it was said:

> "* * * and that, under section 2400, Hemingway's 1927 Code, the judgment of the justice of the peace court could now be pleaded as res adjudicata. This would be true but for the appeal to the circuit court."

This case further specifically held that if the minor had been an adult and had personally appeared, such appearance would have been valid, precisely as it was when the Newells appeared at the May Term.

Naught contra is found in *New York Life Insurance Co.* v. *Bangs,* 103 U. S. 435, 26 L. Ed. 580. Therein, a non-resident infant was sued in Michigan for cancellation of a personal contract. No personal service on the infant was had and this Court followed *Pennoyer* v. *Neff,* 95 U. S. 714, 24 L. Ed. 565. However, these former infants were personally present, while adults, in Mississippi's courts through their solicitor, and so being the effect as to them is a State, not a Federal, question.

V

This did not happen. There was no such judgment. We challenge the statement, p. 24:

> "* * * It is clearly inferable that the Supreme Court of Mississippi would not have reached the conclusion it did without the presence of the Ridgway cross-bill."

But that which Petitioners consistently overlook is that this cross-bill was inherently integrated at the date of the attempted dismissal. The Gulf cross-bill did the work.

Counsel say, p. 25:

> "The Court will understand that there was never any service of this Ridgway cross-bill."

Whether there were or no, under the facts shown, is purely a State question. This particular statute is peculiar. Res. Br., p. 59:

> "'* * * but five days' notice, in writing, to the solicitor of the complainant * * * shall be sufficient * * *'." Sec. 1296, Mississippi Code of 1942.

It makes no provision that aught be filed.

No specific relief, however, was granted under the Ridgway cross-bill. The authorities cited, p. 26, are therefore inapposite. Note the decree, reciting that whereon relief was to be "and the cross-bill of Gulf Refining Company," App. 76, without reference to the Ridgway cross-bill. Note Sections 3 and 4 of the decree wherein no reference whatsoever to the Ridgway cross-bill appears, solely to that of the Gulf.

VI

Frankly, with deference, we categorically deny, p. 28:

> "As we gather Gulf's argument, it does not question at all our contention of non-compliance with this statutory scheme."

Perfect compliance, with deference, was had.

Opposite counsel contend, p. 29:

> "All of those things are based, we submit, on a complete failure to comprehend due process of law. Peti-

> tioners did not, by declining to proceed further, forfeit their right to rely on the observance of the requirements of orderly judicial procedure. Here Respondents seem to admit that orderly judicial procedure was not followed, but to argue that Petitioners had forfeited their right to rely on it."

Absolute conformity to appropriate Mississippi practice was pursued and in no way does that practice contravene the Federal Constitution.

Counsel contend, p. 30:

> "Gulf's response to Petitioners' argument (Br. P. 69) that Gulf did not resist Petitioners' Motion to Dismiss, places itself entirely on the quotation Gulf uses at the top of Page 67 of its Brief, which refers to the statement of Gulf's attorney with regard to the pendency of Gulf's cross-bill. That argument is entirely misleading."

With deference, Gulf's position is perfectly plain under this record and it has attempted to bear the burden it specifically reserved the right to assume when, having obtained protection for itself, it continued to assist those lessors from whom it obtained initially its leases at a small cost and whose rights it felt thus obligated to protect. The prior lessors, having attended and propounded that which they deemed requisite to their defense (the Gulf having protection under its lease), Gulf allowed this course to pursue, but when active proceedings were had at the May Term, confessedly, the Gulf was there and had not in any way foregone its rights precedently.

Counsel claim, p. 31:

> "There was nothing to litigate between Gulf and Petitioners because Gulf held leases both from Peti-

> tioners and Respondents. *Yet Gulf did not apprise the chancellor of that fact.* The chancellor acted, therefore, in awarding decree on Gulf's cross-bill, wholly without the benefit of the settlement which had been made between Gulf and Petitioners."

Clause of this lease, R. 755, App. 41, conclusively shows no settlement was intended but continued active litigation. At the January Term, this lease was directly called to the court's attention, Appendix 41, et seq., and reliance thereon placed. With deference, this claim is not well founded.

Petitioners claim, p. 31:

> "Surely if Petitioners had been vouchsafed the chance to answer Gulf's cross-bill, this is one available defense which Petitioners would have asserted. 'Due process requires that there be an opportunity to present every available defense.' American Surety Co. *v.* Balding, 287 U. S. 156, 77 L. ed. 231."

But Petitioners, knowing that which was to be, namely: a final hearing, voluntarily withdrew, advising the Chancellor that they would not further participate and if they intended to raise the question in the Mississippi Supreme Court under its practice, it well may be questioned whether they could have thus done, for it must be remembered that the original bill had not been dismissed and constituted, along with Gulf's cross-bill, that whereon relief was granted. Compare *Mitchell* v. *Film Transit Co., supra.* As accurately understood by Petitioners, the hearing could not have been alone on the cross-bill, but on the entire pleadings, and if Petitioners therein participated, the right to challenge was gone. Frankly, the Mississippi court could have very well held that this right was foregone when Petitioners filed their so-called protest on May 6th. The character of that protest was primarily, if not exclusively, a Mississippi question and

had Mississippi's court so thereasto held, obviously it would not be here reviewable, Petitioners under such holding having foregone the question of the improper refusal, as alleged, to dismiss without prejudice.

VIII

We deny again that the original bill had been dismissed before the May Term. Along with the cross-bill, it constituted that whereon the final hearing had to be and the hearing on the cross-bill could not delay the hearing on the undismissed original bill and had to be, under Mississippi practice, synchronized therewith. As was well known under the *Film Transit Company* case, *supra,* the original bill had to be dismissed with prejudice at that term and so was.

Counsel say, p. 33:

> "*The point here, as elsewhere, is that there is no dispute whatever about Mississippi law or its provisions.* Petitioners' contention is that they were denied due process of law by the failure of the Mississippi Courts to accord them the protection of the *rules admitted to exist.*"

With deference, Respondents deny, as found by Mississippi's Courts, that there was a failure to accord Petitioners full right in strict accordance with Mississippi's practice, and that whereof Petitioners complain is that when Petitioners invited a dismissal with prejudice, which was to them well known to be requisite, and received that dismissal with prejudice of their bill, they now seek thereat to complain after Mississippi's Supreme Court, on a ground purely local amply buttressed by uncontrovertible authorities, affirmed, leaving undetermined at least four State questions. Further, there was a determination on the facts which had been put in the record by the Respondents in such a manner as to be incontrovertible, demonstrating there never was any

such deed as by Petitioners claimed and as now appears from the public records of Jasper County. Appendix "A," Res. Br. 77, R. 895.

IX

Counsel state, p. 34:

> "The series of decisions of this Court demonstrates incontestably that due process requires that all litigants have the opportunity to contest at each step of the proceeding the contention of his adversary as those contentions are raised in obedience to recognized procedure."

Which is, in general, true, but Petitioners had these rights as demonstrated in brief for Respondents, wherein among others were cited the cases of *York* v. *Texas,* 137 U. S. 15, 34 L. ed. 604; *Hammond Packing Co.* v. *State of Arkansas,* 212 U. S. 322, 53 L. ed. 530, and many others, which are not in any way referred to and no differentiation whatsoever attempted.

Petitioners say, p. 34:

> "Petitioners stand denied a trial on the merits because they have been condemned for defaulting in a matter with which they were never faced."

But Petitioners, as they might, elected to forego the trial on the merits so that they might present to the Supreme Court of Mississippi their alleged rights denied by the Chancellor, that is, to dismiss without prejudice. Mississippi might thus lawfully require.

X

Petitioners say, p. 34:

> "It is not strange that Gulf devotes less than a page to an attempt to answer our extended argument on this

point (Br. P. 95-105) because this ruling does not affect Gulf at all."

With deference, this ruling is vital to Gulf's rights which it sought to protect so as that it might lawfully pay to its lessors the royalty rightly due them. Therefor it specifically contracted and thereto it is lawfully entitled.

Petitioners overlook the fact that under the *Film Transit Company* case, *supra,* the entire bill had to be dismissed with prejudice before Petitioners could appeal. Petitioners, with deference, concede that this dismissal with prejudice thus had to be and having been, its legal effect is the same as in any other case. The relief granted under Gulf's cross-bill did not add, with deference, one single thing to the binding effect of the final dismissal under Section 2 of the decree, according to Petitioners' claim, which reads: (Appendix 77)

> "That the complainants are not entitled to the relief prayed for nor to any relief and that the original bill and all amendments thereto be and they are hereby dismissed with prejudice."

Conclusion

Petitioners claim, p. 35:

> "A careful analysis of the briefs filed on behalf of the Respondents reveals, we submit, that it is not seriously contended that the Mississippi Courts have not committed error in the respects claimed by us."

Respondents aver that no error whatsoever occurred in any aspect in the Mississippi Courts and thus Respondents have and do now so contend.

The paraphrasing by Petitioners on page 36, with deference, is a fundamental mis-conception of respondents' claim. Respondents aver that Petitioners had no right, under Mississippi law, to dismiss without prejudice and when Peti-

tioners determined to stand on the proposition that they could thus do, they consciously overrode the decree of the Chancellor. When Petitioners applied for an interlocutory appeal to the Supreme Court of Mississippi, R. 1326, Mr. Justice Griffith definitely admonished Petitioners:

> "This matter was discussed with my associates yesterday afternoon, and it was the majority opinion, tentative of course, that (1) The Chancellor *was probably right* in refusing the dismissal, and * * *."

So that in advance of the election at the May Term, these Petitioners had the considered decision of the Chancellor and a pre-trial expression from the Supreme Court of Mississippi that the Chancellor's decision was correct and yet notwithstanding this decision of the learned Chancellor and this declaration of the Supreme Court of Mississippi, Petitioners would rather bet that they could reverse the judgment in the Supreme Court as to this procedural matter and lose their case thereby consciously than to submit their evidence to the Chancellor. With deference, their evidence must be mighty weak.

Petitioners, thus forewarned as to their inaccurate conception of Respondents' rights, subsequently judicially determined in the Supreme Court, cast caution to the winds, relying upon their unquestioned ability, they choose to endeavor to make the Supreme Court of Mississippi change its previously expressed, tentative opinion and when they therein thus failed—having refused to disclose their evidence when they had a right so to do—they cannot ask this Court to grant certiorari so that they may endeavor by parole to controvert the recorded deed, executed in 1880, whereunder Respondents' predecessors in good faith purchased from Mary E. Hudson that to her conveyed by her husband and entered into possession thereof claiming the

title thereto adversely as shown in this record for a period of almost fifty years. Certiorari does not reach such a case.

Respectfully,

JOHN E. GREEN, JR.
R. E. WILBOURN.
IRWIN W. COLEMAN.
W. H. WATKINS, SR.
W. CALVIN WELLS.
JUDGE J. M. STEVENS.
J. R. BUCHANAN.
STONE WELLS.
W. R. NEWMAN.
W. S. WELCH.
P. H. EAGER, JR.
GARNER W. GREEN, SR.

WILBOURN & WILBOURN,
Meridian, Mississippi.
WATKINS & EAGER,
Jackson, Mississippi.
WELLS, WELLS, NEWMAN & THOMAS,
Jackson, Mississippi.
STEVENS & CANNADA,
Jackson, Mississippi.
BUCHANAN & MONTGOMERY,
Laurel, Mississippi.
WELCH, COOPER & WELCH,
Laurel, Mississippi.
GREEN & GREEN,
Jackson, Mississippi.